

SEP 24 1981

REF: GE-ME

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Gary Broetzman
Director, Water Quality
Control Division
Colorado Department of Health
4210 East 11th Avenue
Denver, Colorado 80220

Re: Notice of Violation of NPDES
Discharge Permit Number CO-0000248
AMAX-Climax
(Pursuant to 33 U.S.C. 1319(a)(1))

Dear Mr. Broetzman:

You are hereby informed, in accordance with the provisions of the referenced statute, that the U.S. Environmental Protection Agency has established that a violation of the referenced permit has occurred. Information relevant to this finding of violation is attached. It is requested that your office inform this Agency of the follow-up and/or enforcement action taken to insure compliance with the applicable terms and conditions of the referenced permit within 15 (fifteen) days of your receipt of the NOV Summary Sheets mailed to you by this Agency.

A copy of this Notice has been sent to the permittee. If you have any questions, please contact Nina Churchman of this Agency at (303) 837-4335.

Sincerely yours,

 Roger Frenette

Christine M. Phillips
Acting Director
Enforcement Division

Enclosure

cc: Mr. James C. Gilliland
AMAX, Inc.
1707 Cole Boulevard
Golden, Colorado 80401

Mr. Robert A. Hykan
Assistant Attorney General

NCHURCHMAN:vgt:8/19/81:Ex.3760

Churchman
8-21-81

Hykan
8/24/81

AMAX
8/25/81

SUMMARY OF VIOLATIONS

CO-0000248

Quarterly Discharge Monitoring Reports submitted by AMAX-Climax during the first half of 1981 show the following violations:

<u>PARAMETER</u>	<u>REPORTING PERIOD</u>	<u>PERMIT LIMIT, mg/l</u>	<u>REPORTED CONCENTRATION, mg/l</u>
Copper	January 1 through January 25, 1981 <u>a/</u>	0.1 <u>b/</u>	0.47 <u>c/</u>
		0.2 <u>d/</u>	0.75 <u>e/</u>
Chemical Oxygen Demand (COD)		20 <u>f/</u>	35 <u>c/</u>
		30 <u>d/</u>	40 <u>e/</u>
Copper	January 26 through March 31, 1981 <u>g/</u>	0.1 <u>b/</u>	0.4 <u>c/</u>
		0.3 <u>d/</u>	0.55 <u>e/</u>
COD		20	39 <u>c/</u>
		30	39 <u>e/</u>
COD	April 1 through June 30, 1981	20	36 <u>c/</u>
		30	36 <u>e/</u>

In addition, AMAX did not comply with the monthly sampling requirement established in its permit, Part I.A.2., for COD. During the period January 26 through March 31, 1981, AMAX reported only one COD value.

The receiving stream is Ten Mile Creek.

- a/ During this period the limits established by the second amendment to the August 25, 1978 Administrative Order, and those limits contained in AMAX's NPDES permit which were not addressed by the Order were in effect.
- b/ This is a 30-day average limitation.
- c/ This number is based on the quarterly average of any samples taken during the quarter.
- d/ This is a daily maximum limitation.
- e/ This is the maximum concentration discharged during the reporting period.
- f/ This is a daily average limitation.
- g/ During this period and continuing until the present, the limits established by the third amendment to the August 25, 1978 Administrative Order and those limits contained in AMAX's NPDES permit which are not addressed by the amendment are in effect.

We are aware that AMAX-Climax is currently not discharging any waste water, and that therefore, the Company is in compliance with the provisions of its permit. This Notice of Violation is being sent to remind the Company that during its last period of discharge it was in noncompliance and to suggest that a resolution to these violations be addressed during AMAX's study of its treatment processes.

To summarize, reporting to the Colorado Department of Health will consist of a monthly and quarterly report. The monthly report will contain a summary of weekly analysis as required under the Third Amendment to the Cease and Desist order (HL WQ HZWW). Parameters to be analyzed for and limits to be met are as follows:

<u>Parameter</u>	<u>Concentration (mg/l)</u>	
	<u>30-day Average</u>	<u>Daily Maximum</u>
Total Suspended Solids	25	25
Cyanide	-	0.4
Total Iron	-	2.0
Total Zinc	-	0.5
Total Manganese	-	1.0
Total Cadmium	-	0.03
Total Copper	0.10	0.30
Total Lead	-	0.1

The pH shall not be less than 6.0 standard units nor greater than 9.0 standard units.

In addition the quarterly self monitoring report will contain a summary of monthly samples taken at discharge point 001 for Molybdenum, COD, Fluoride, and Oil and Grease. Limits for these parameters are as follows:

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>		<u>Monitoring Requirements</u>			
	kg/day (lbs/day)		Concentration mg/l mg/l		Measurement Frequency	Sample Type
	Daily Avg.	Daily Max.	Daily Avg.	Daily Max.		
Total Molybdenum	152(400)	454(1000)	N/A	N/A	Weekly	Grab
COD	N/A	N/A	20	30	Monthly	Grab
Fluoride	N/A	N/A	N/A	N/A	Monthly	Grab

The oil and grease shall not exceed 10 mg/l in a single grab sample and shall be monitored monthly with a grab sample.